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15 UNITED STATES DISTRICT COURT
16 DISTRICT OF NEVADA, SOUTHERN DIVISION
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19 ERIN J. PAXSON, Case No. 2:24-cv-00907-APG-EJY
20 Plaintiff,
21 vs.
22 LIVE NATION ENTERTAINMENT, INC., a
Delaware Corporation; LIVE NATION
WORLDWIDE, INC., a Delaware
Corporation; C3 PRESENTS, LLC, a
Texas Limited-Liability Company; FRONT
GATE TICKETING SOLUTIONS, LLC, a
Delaware Limited-Liability Company,
JOHN ROE COMPANIES NOS. 1-5, ROE
BUSINESS ENTITIES NOS. 1-20; AND
DOE INDIVIDUALS NOS. 1-100,
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27 Defendants.
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STIPULATION AND ORDER
REGARDING PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION AND
DEFENDANTS' MOTION TO COMPEL
ARBITRATION
(FIRST REQUEST)

1 **STIPULATION AND ORDER REGARDING PLAINTIFF'S MOTION FOR CLASS**
 2 **CERTIFICATION AND DEFENDANTS' MOTION TO COMPEL ARBITRATION**
 3 **(FIRST REQUEST)**

4 COMES NOW, Plaintiff ERIN J. PAXSON ("Plaintiff"), by and through her counsel of
 5 record, THE702FIRM; and Defendant LIVE NATION ENTERTAINMENT, INC., Defendant
 6 LIVE NATION WORLDWIDE, INC., Defendant LIVE NATION WORLDWIDE, LLC,
 7 Defendant C3 PRESENTS, LLC, and Defendant FRONT GATE TICKETING SOLUTIONS,
 8 LLC (collectively "Defendants"), by and through their counsel of record, LEWIS BRISBOIS
 9 BISGAARD & SMITH, LLP, and hereby respectfully submit this Stipulation and Order to (1)
 10 extend the deadlines for Defendants' Opposition and Plaintiff's Reply to Plaintiff's Motion for
 11 Class Certification, filed on May 16, 2024 [Doc. 11], until after this Honorable Court rules
 12 upon Defendants' Motion to Compel Arbitration; and (2) extend the deadlines for Plaintiff's
 13 Opposition and Defendants' Reply to Defendants' Motion to Compel Arbitration filed on May
 14 21, 2024 [Doc. 13].

15 Currently, the briefing schedule and hearing for Plaintiff's Motion for Class
 16 Certification ("Plaintiff's Motion") is as follows:

17 Defendants' Opposition: May 30, 2024

18 Plaintiff's Reply: June 6, 2024

19 Also, the current briefing schedule for Defendants' Motion to Compel Arbitration
 20 ("Defendants' Motion") is as follows:

21 Plaintiff's Opposition: June 4, 2024

22 Defendants' Reply: June 11, 2024

23 Hearings have not been set for either Motion. The parties respectfully request that
 24 a hearing be set for Defendants' Motion to Compel Arbitration within the next thirty (30)
 25 days. Further, assuming the case proceeds in this Court rather than arbitration, the parties
 26 respectfully request that a hearing be set for Plaintiff's Motion for Class Certification shall
 27 be set at least forty-five (45) days after a ruling on Defendants' Motion to Compel Arbitration
 28 is made. With respect to Defendants, this is made without prejudice to their right to request
 a different briefing schedule and hearing, if appropriate, after a responsive pleading

1 responding to the claims and allegations in the Complaint is filed. Plaintiff reserves her
2 right to oppose such a request.

3 **PROPOSED DEADLINES**

4 The parties stipulate to the following briefing schedule for Defendants' Motion to
5 Compel Arbitration:

6 Plaintiff's Opposition: June 11, 2024
7 Defendants' Reply: June 18, 2024

8 Moreover, the parties stipulate to the following briefing schedule for Plaintiff's Motion
9 for Class Certification is as follows:

10 Defendants' Opposition: two (2) weeks before the hearing
11 Plaintiff's Reply: one (1) week before the hearing

12 **REASON FOR EXTENSION**

13 If Defendants' Motion to Compel Arbitration is heard and decided by the Court before
14 Plaintiff's Motion for Class Certification, the parties may not need to expend substantial
15 resources and costs associated with drafting opposition and reply briefs to Plaintiff's
16 Motion, as well as appearing for the hearing on Plaintiff's Motion. Further, Defendant
17 contends that this case should proceed in arbitration, which renders the filing for
18 certification potentially moot if the motion to compel arbitration is granted. Accordingly, the
19 parties agree that briefing and hearing Defendant's Motion prior to Plaintiff's Motion is in
20 the interest of judicial economy.

21 Additionally, due to the complexity of Plaintiff's Complaint and Defendant's Motion,
22 the parties agree that a one (1) week extension for opposition and reply briefs is necessary.

23 This stipulation is made in good faith and not for the purpose of delay.
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1 This is the first extension of time requested by counsel.

2 DATED this 29th day of May, 2024.

3 THE702FIRM

4
5 /s/ Joel S. Hengstler

6 _____
7 JOEL S. HENGSTLER, ESQ.
Nevada Bar No. 11597
8 Attorney for Plaintiff

DATED this 29th day of May, 2024.

LEWIS BRISBOIS BISGAARD &
SMITH LLP

/s/ Laureen P. Frister

LAUREEN P. FRISTER, ESQ.
Nevada Bar No. 13217
Attorney for Defendants

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11 **ORDER**

12 IT IS SO ORDERED.

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14 Dated this 30th day of May, 2024.

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18 UNITED STATES MAGISTRATE JUDGE